

**UNITED STATES U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

ROUZBEH “ROSS” HAGHIGHAT,
BEHROUZ “BRUCE” HAGHIGHAT,
KIRSTYN M. PEARL, SEYEDFARBOD
“FABIO” SABZEVARI, and JAMES D.
ROBERGE

Hon. Michael E. Farbiarz

Crim. No. 25-339

**CERTIFICATION OF ADAM FEE IN
SUPPORT OF DEFENDANT
ROUZBEH “ROSS” HAGHIGHAT’S
OMNIBUS PRETRIAL MOTIONS**

I, **ADAM FEE**, hereby certify as follows:

1. I am an attorney-at-law, admitted to the bars of the States of New York and California and admitted to practice in the United States District Court for District of New Jersey, among many other courts. I am also a Partner with Paul Hastings LLP, counsel for Defendant Rouzbeh “Ross” Haghighat in the above-captioned matter.

2. I submit this Certification based upon my personal knowledge and review of the relevant documents and recording in support of Mr. Haghighat’s Omnibus Pretrial Motions.

3. In accordance with Paragraph 8 of the Protective Order entered by the Court on June 16, 2025 (ECF No. 52), a true and correct copy of the following materials are being simultaneously transmitted via email to the Chambers of Judge Michael E. Farbiarz.

- a. An unredacted copy of the Omnibus Brief in Support of Defendant Rouzbeh “Ross” Haghighat’s Pretrial Motions; and
- b. Exhibit A, which is a true and correct copy of the recording of the March 4, 2025 interrogation of Mr. Sabzevari. This recording was produced by the Government in

native format, along with a slip sheet bearing the Bates number DOJ-PROD-0000247466.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: August 8, 2025

Respectfully Submitted,

By: *s/ Adam Fee*

Adam Fee
Paul C. Gross
PAUL HASTINGS LLP
200 Park Avenue
New York, NY 10166
(212) 318-6000
adamfee@paulhastings.com
paulgross@paulhastings.com

*Attorneys for Defendant Rouzbeh "Ross"
Haghighat*